

CAUSE NO. 017-323588-21

ASERDA ALHERBI	§	IN THE DISTRICT COURT
	§	
vs.	§	TARRANT COUNTY, TEXAS
	§	
PACCAR FINANCIAL CORP. d/b/a	§	
PACCAR LEASING COMPANY,	§	
JACKSON TRANSPORTATION	§	
SERVICES, INC., HYUNDAI MOTOR	§	
AMERICA, AND JUAN MERCADO	§	17 <sup>TH</sup> JUDICIAL DISTRICT

**AFFIDAVIT OF TAE HYUN JUN**

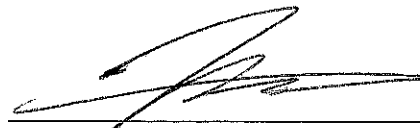
BEFORE ME, the undersigned authority, on this day personally appeared Tae Hyun Jun, the undersigned Affiant, who swore on oath that the following facts are true and correct and within her personal knowledge.

"My name is Tae Hyun Jun. I am a Senior Director of Human Resources of Hyundai Translead, located in San Diego, California, and based upon this position I have personal knowledge of the facts stated herein. I am over the age of eighteen (18) years and am fully competent to testify herein.

1. Hyundai Translead is organized under the laws of the State of California, with its principal place of business in San Diego, California.
2. Hyundai Translead does not own real property in the State of Texas, does not have corporate offices in the State of Texas, and does not have any corporate officers in the State of Texas.
3. Hyundai Translead does not specifically advertise or market its products specifically to customers in the State of Texas.
4. Hyundai Translead does not maintain a bank account in the State of Texas.
5. Hyundai Translead does not maintain any corporate records in the State of Texas.
6. The trailer allegedly involved in the accident has been identified as VIN No: 3H3V532C3FT658071.
7. The trailer allegedly involved in the accident was not designed or manufactured within the State of Texas.
8. The trailer allegedly involved in the accident was designed in the State of California and Country of Mexico and manufactured (calendar year 2014) in Tijuana, Baja California, Mexico.

9. The trailer allegedly involved in the accident was not originally sold to any party to this litigation by Hyundai Translead. The original sale transaction occurred in the State of California.
10. Hyundai Motor America is not involved in the design, manufacture or sale of Hyundai Translead trailers.
11. I have read *Defendant Hyundai Translead's Special Appearance & Original Answer*, and the facts that are within my personal knowledge set forth in the Special Appearance are true and correct.

**Further Affiant sayeth not.**



**Tae Hyun Jun**

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

STATE OF CALIFORNIA

COUNTY OF San Diego

Subscribed and sworn to (or affirmed) before me on this 26 day of July, 2021, by Tae Hyun Jun, proved to me on the basis of satisfactory evidence to be the person who appeared before me.



Notary Public

(Seal)

